

UNITED STATES DISTRICT COURT
DISTRICT MASSACHUSETTS

UNITED STATES OF AMERICA)
vs.)
ANNE M. LYNCH,)
Defendant.)
CRIMINAL
NO.: 19-10345-DPW

DEFENDANT ANNE M. LYNCH'S
MOTION TO DISMISS OF THE INDICTMENT IN PART

Now comes Defendant, Anne M. Lynch, (hereinafter "Lynch") by and through undersigned counsel, and hereby respectfully moves this Honorable Court for an Order dismissing certain counts and parts of the indictment.

Specifically, this motion seeks a complete dismissal of the count that alleges a conspiracy to commit honest services wire fraud and wire fraud (Count III), a complete dismissal of the count that alleges honest services wire fraud and aiding and abetting (Count IV) a complete dismissal of the count that alleges wire fraud and aiding and abetting (Count V), and a complete dismissal of the count that alleges two counts of wire fraud and aiding and abetting for one transaction (Counts VI & VII). Also, this motion seeks a partial dismissal of the count in the indictment that alleges Lynch participated in a racketeering conspiracy (Count I), and a partial dismissal of the count that alleges Lynch participated in a racketeering enterprise by committing honest services wire fraud, wire fraud, aiding abetting honest services wire fraud and commercial bribery (Count II). The motion to dismiss does not seek dismissal of the remaining counts in the indictment (Counts VIII – XVIII). A memorandum of law in support of this motion is filed herewith.

WHEREFORE, defendant Anne M. Lynch, by and through undersigned counsel, respectfully requests the Court to grant this motion and dismiss the Counts in full and in part, as set forth above, against her.

Respectfully submitted,
For Anne M. Lynch
By her attorneys
LAWSON & WEITZEN, LLP

/s/ Scott P. Lopez
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Dated: April 5, 2021

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 5, 2021.

/s/ Scott P. Lopez
Scott P. Lopez